

JOHN C. CRUDEN, Assistant Attorney General  
United States Department of Justice  
Environment & Natural Resources Division

SETH M. BARSKY, Section Chief  
S. JAY GOVINDAN, Assistant Section Chief  
JEREMY HESSLER, Trial Attorney  
Wildlife & Marine Resources Section  
P.O. Box 7611, Washington D.C. 20044  
(202) 305-0431, facsimile (202) 305-0275  
[jeremy.hessler@usdoj.gov](mailto:jeremy.hessler@usdoj.gov)

MAUREEN E. RUDOLPH, Senior Trial Attorney  
TY BAIR, Trial Attorney  
Natural Resources Section  
P.O. Box 7611, Washington, D.C. 20044-7611  
(202) 514-2795, facsimile (202) 305-0506  
COUNSEL FOR FEDERAL DEFENDANTS  
Attorneys for the Federal Defendants

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

JUDY BUNDORF, an individual; FRIENDS OF  
SEARCHLIGHT DESERT AND MOUNTAINS;  
BASIN AND RANGE WATCH; ELLEN ROSS,  
an individual; and RONALD VAN FLEET, SR.,  
an individual,

Plaintiffs,

v.

S.M.R. JEWELL, Secretary of the Interior,  
BUREAU OF LAND MANAGEMENT, U.S.  
FISH & WILDLIFE SERVICE,

Defendants.

No. 2: 13-cv-00616

UNOPPOSED MOTION FOR  
EXTENSION OF TIME

(Second Request)

Pursuant to Local Rules 6-1(b) and 6-2(a) and Judge Du's Civil Standing Order, Federal  
Defendants S.M.R. Jewell, Secretary of the Interior, Bureau of Land Management ("BLM"), and

U.S. Fish and Wildlife Service (“FWS”) hereby request an extension of time to file their points and authorities in response to Plaintiffs’ Motion to Vacate (ECF No. 99), Motion for Permanent Injunction (ECF No. 100), and Motion for Clarification of Order (ECF No. 101), revising the briefing schedule to reflect the response will be due March 26, 2015. Intervenor-Defendant requests an equivalent extension to March 26, 2015 for its response to Plaintiffs’ motions. Finally, Plaintiffs request an extension to April 17, 2015 to file their reply brief. Undersigned counsel for Federal Defendants have conferred with counsel for Defendant-Intervenor and for Plaintiffs, who have indicated that they concur in the revised schedule and do not oppose this motion.

Federal Defendants have requested one previous extension in this case for a prior summary judgment brief deadline, which Intervenor-Defendant joined and which the Court granted. (ECF Nos. 50, 52). The Court has granted three previous extensions to Plaintiffs on prior deadlines, including an extension of their deadlines to response to Federal Defendants’ Cross-Motion for Summary Judgment and Motion to Strike. (*See* ECF Nos. 33, 69), as well as a Motion to Extend Time to File Bill of Costs (ECF No. 92).

The extension requested in this motion is necessary due to counsel’s litigation obligations in other cases, including *Friends of Animals v. Jewell*, No. 15-cv-0016 (D. D.C.); *Bishop v. Bostick*, No. 13-cv-0082 (N.D. Tex.) and *No Casino in Plymouth v. Jewell*, No. 12-cv-1748 (E.D. Cal.). Granting this motion will not prejudice any party and will not affect any subsequent court-ordered deadlines.

Accordingly, Federal Defendants respectfully request that the upcoming deadlines be revised as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Requested Extension</b>
Federal Defendants' and Defendant-Intervenor's response to Plaintiffs' motions (ECF Nos. 99-101):	March 18, 2015	March 26, 2015
Plaintiffs' reply in support of motions (ECF Nos. 99-101):	March 25, 2015	April 17, 2015

For the foregoing reasons, Federal Defendants respectfully request that this Court grant this unopposed motion.

Respectfully Submitted,

John C. Cruden, Assistant Attorney General  
United States Department of Justice  
Environment & Natural Resources Division

Seth M. Barsky, Section Chief  
S. Jay Govindan, Assistant Section Chief

/s/ Jeremy Hessler  
Jeremy Hessler, Trial Attorney  
Wildlife & Marine Resources Section  
P.O. Box 7611, Washington D.C. 20044  
(202) 305-0431, facsimile (202) 305-0275  
[jeremy.hessler@usdoj.gov](mailto:jeremy.hessler@usdoj.gov)

Maureen E. Rudolph, Senior Trial Attorney  
Ty Bair, Trial Attorney  
Natural Resources Section  
P.O. Box 7611, Washington, D.C. 20044-7611  
(202) 514-2795, facsimile (202) 305-0506  
Counsel for Federal Defendants  
Attorneys for the Federal Defendants

OF COUNSEL

Janell Bogue  
Gregory Russell  
Office of the Solicitor  
U.S. Department of Interior

DATED: March 12, 2015

**IT IS SO ORDERED:**

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

Miranda M. Du  
United States District Judge

March 13, 2015

**DATED:** \_\_\_\_\_

2:13-cv-616-MMD-